

State of Utah Consolidated State Application Accountability Workbook

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UTAH STATE OFFICE OF EDUCATION

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PART I: Summary of Required Elements for State Accountability Systems

Summary of Implementation Status for Required Elements of State Accountability Systems

Principle 1: All Schools		
F	1.1	Accountability system includes <i>all schools and districts in the state</i> .
F	1.2	Accountability system holds <i>all schools to the same criteria</i> .
F	1.3	Accountability system incorporates the <i>academic achievement standards</i> .
F	1.4	Accountability system provides <i>information in a timely manner</i> .
P	1.5	Accountability system includes <i>report cards</i> .
W	1.6	Accountability system includes <i>rewards and sanctions</i> .
Principle 2: All Students		
F	2.1	The accountability system includes all students
F	2.2	The accountability system has a consistent definition of full academic year.
F	2.3	The accountability system properly includes mobile students.
Principle 3: Method of AYP Determinations		
P	3.1	Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-14.
P	3.2	Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.
P	3.2a	Accountability system establishes a starting point.
P	3.2b	Accountability system establishes statewide annual measurable objectives.
P	3.2c	Accountability system establishes intermediate goals.
Principle 4: Annual Decisions		
P	4.1	The accountability system determines annually the progress of schools and districts.

STATUS Legend:

F – Final state policy

P – Proposed policy, awaiting State approval

W – Working to formulate policy

Principle 5: Subgroup Accountability

F	5.1	The accountability system includes all the required student subgroups.
F	5.2	The accountability system holds schools and LEAs accountable for the progress of student subgroups.
P	5.3	The accountability system includes students with disabilities.
W	5.4	The accountability system includes limited English proficient students.
P	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
P	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

F	6.1	Accountability system is based <i>primarily on academic assessments</i> .
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Principle 7: Additional Indicators

F	7.1	Accountability system includes graduation rate for high schools.
P	7.2	Accountability system includes an additional academic indicator for elementary and middle schools.
P	7.3	Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/Language Arts and Mathematics

P	8.1	Accountability system holds students, schools and districts separately accountable for reading/language arts and mathematics.
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Principle 9: System Validity and Reliability

P	9.1	Accountability system produces reliable decisions.
P	9.2	Accountability system produces valid decisions.
W	9.3	State has a plan for addressing changes in assessment and student population.

Principle 10: Participation Rate

P	10.1	Accountability system has a means for calculating the rate of participation in the statewide assessment.
P	10.2	Accountability system has a means for applying the 95% assessment criteria to student subgroups and small schools.

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PART II: State Response and Activities for Meeting State Accountability System Requirements

Principle 1: All Schools

1.1 Accountability system includes all schools and district in the state.

Utah requires all schools and LEAs, including those serving special populations and charter schools, to participate in the Utah Performance Assessment System for Students (U-PASS). Special population schools include the Utah Schools for the Deaf and the Blind, and Youth in Custody (YIC). Several key steps in the accountability process assure inclusion of all students, schools, and LEAs.

- For many years, the Utah State Office of Education (USOE) has pre-printed assessment answer sheets for all Utah schools. This pre-printing is based on official state IDs and school names. At the time of USOE test scoring, the USOE is able to assure that all schools are participating in testing.
- In the past year, the USOE has refined the system to include a second stage of verification. School names and IDs are checked against the official state list that is maintained by the USOE School Finance and Statistics Section.
- With the implementation of the Utah Alternate Assessment program (UAA) those schools that serve students who have severe disabilities are able to fully participate in testing and accountability.
- Finally, USOE can ensure that YIC students also participate in testing and accountability.

U-PASS includes course/grade specific criterion-referenced tests (Core CRTs) as well as norm-referenced tests, performance tasks and diagnostic testing. For compliance with federal No Child Left Behind (NCLB) legislation, the Core CRTs from U-PASS will be used to report academic achievement. Using a subset of tests from U-PASS allows Utah to utilize all rules, auditing procedures, and practices already in place to meet NCLB requirements.

Supporting evidence and background:

- School Code Memo
http://www.usoe.k12.ut.us/eval/test_policy/schoolcodesmemo.pdf
- Data Warehouse/ Reporting website project -
<http://www.usoe.k12.ut.us/upass/>
- State code regarding testing – Appendix A.
- Youth In Custody test procedures
http://www.usoe.k12.ut.us/eval/test_policy/YIC/yic.htm

1.2 Accountability system holds all schools to the same criteria.

U-PASS holds all schools accountable to the same criteria as mandated by the Utah Legislature. Central components of state and federal accountability are the state's high quality standards-based criterion-referenced assessments (Core CRTs). Compared to many states, Utah has a long history of standards-based assessments aligned to the Utah Core Curriculum, which is a comprehensive curriculum for each subject at each grade-level/course as mandated by state law. The first use of Utah's Core CRTs was in the 1989-1990 school year.

Over the past four years, performance standards have been established for all Core CRTs. Across all tested grades and subject areas, the Bookmark Technique was utilized. To assure appropriate use of the method, USOE staff consulted with original authors of the technique. The same performance standards are approved for the Utah Alternate Assessment (UAA). Establishing the same performance standards allows the state to include special population schools that do not take the Core CRTs in standard or modified conditions, but do participate in the UAA.

Other non-testing indicators (graduation rate and attendance) are uniformly defined and implemented in schools and LEAs across the state. This uniformity of measures assures that the same criteria will be applied in determining LEA and school AYP status.

- 1.3 Accountability system incorporates, at a minimum, a definition of *basic*, *proficient*, and *advanced* student achievement levels in reading/language arts and mathematics.

Utah has defined proficiency levels for all Core CRTs. The cut scores for each Core CRT were established using the Bookmark Technique. Four levels are defined: Level 1: Minimal, Level 2: Partial, Level 3: Sufficient, Level 4: Substantial. The Utah State Board of Education adopted the new titles and descriptors on April 4, 2003. The descriptors for each level as well as the match to federal proficiency levels are outlined in Table 1.

Table 1: Utah Student Achievement Level Matched to Federal Levels

Level	Descriptor	Federal Levels
Level 4: Substantial	A student scoring at this level is proficient on measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates substantial understanding and application of key curriculum concepts.	Advanced
Level 3: Sufficient	A student scoring at this level is proficient on the measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates sufficient understanding and application of key curriculum concepts.	Proficient
Level 2: Partial	A student scoring at this level is not yet proficient on measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates partial understanding and application of key curriculum concepts.	Basic
Level 1: Minimal	A student scoring at this level is not yet proficient on measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates minimal understanding and application of key curriculum concepts.	

Supporting evidence and background:

- Standard setting for Utah – Appendix B
- Bookmark Standard Setting (Background and Uses) -
<http://www.dpi.state.wi.us/dpi/oea/ctbbkmrk03.html>
<http://www.assess.com/Books/b-36748.htm>
<http://www.cde.state.co.us/cdeassess/asperf.htm>

1.4 Accountability system provides information in a timely manner.

Decisions about adequate yearly progress will be made in a timely manner, sufficient for notification to occur prior to the beginning of the next academic year, and in time for appeals to be made by the school and LEAs, if necessary. The anticipated date of preliminary AYP decisions is the first week of August. This will be accomplished by continuing with current policy for data submission to the Utah State Office of Education (USOE).

Meeting the deadlines specified in the requirements is mandated by board rule and allows the withholding of Minimum School Program funds for failure to report these data on time. Table 2 outlines the data elements/events, purposes, and date due for the 2002-2003 school year and all years thereafter. All dates refer to the time by which the required data are to be “clean and final,” but not the date of final submission.

Table 2: Data Submission Timeline

Data Element/Event	Purpose	Date
Test Pre-print file	Pre-print of test answer documents	April 1
Test Window	Language Arts test completion	Three weeks, beginning six weeks prior to last Monday of school year
	Mathematics test completion	Three weeks, beginning four weeks prior to last Monday of school year
Test Answer Documents	Scoring of student answer documents by USOE	Last day of district school calendar (1 week after close of test window)
End of Year Clearinghouse Data	Student level demographic data including cumulative add/drop codes	July 15
Statistical (S3) File	Student level fee-waiver, free/reduced lunch data	July 15

For many years, the USOE has scanned and scored Core CRTs. This has been a great benefit for quality control and scoring turnaround. The testing window for the Core CRTs maximizes the days of instruction but still facilitates timely scoring and reporting of results.

The USOE is in the final stages of developing and implementing a state Data Warehouse. The Data Warehouse will serve as the foundation for the analysis and generation of school and district performance reports and determination of LEA and school AYP prior to the start of a new school year. Appeals will be allowed at the school and LEA level. The timeline currently in place allows schools enough time to notify parents about public school choice or supplemental educational service options.

Student Pre-Print Data (March/April) - Preprint student data is submitted to USOE. This data includes student demographic data. At the district and school level, this data is summarized and sent to districts to approve or make corrections in their operational student data and then resubmit it. This individual information is used to pre-print Core CRT answer sheets. This process has both reduced work for the students and improved student data. Districts provide written approval of their pre-print data before answer sheets are printed.

Core CRT Scanning & Scoring (May/June) - Math and Language Arts Core CRTs are scanned and scored by USOE. We are one of only a few states that do in-house scanning and scoring. This approach leads to faster scoring turnaround, stronger quality assurance procedures and more accurate test data transfer to our USOE Data Warehouse. Throughout the scanning process, inconsistencies and problems with student answer sheets are identified and corrected. Depending on the issue, either the district or school is directly involved. USOE scoring staff is assigned certain districts. This has enabled a relationship to develop with the districts and increases the cooperation as scanning or scoring issues arise. Scoring turnaround and testing procedures are well documented in Utah Board rule, R277-473-3. Time Periods for Administering and Returning Test Materials.

Clearinghouse “End of Year” data submission (July) - From an accountability perspective, this student level data submission provides background characteristics, grade level data, enrollment date, exit date, graduation status, and attendance. This serves as the foundation of student level identification to which test data is matched. These data are passed on to the USOE Data Warehouse for integration with the other data systems.

Teacher and Course Data (i.e., CACTUS) submission (July) - Teacher and course level data is maintained in the CACTUS database. This database is centralized by USOE. CACTUS serves as the operational teacher system and is updated throughout the school year. Districts are required to have all changes into the system finalized by July 1st.

Behavior and Assessment Data Merge (July/August) - USOE data warehouse will begin merging various data systems needed for AYP calculations. We have a common naming and id system that districts should have employed. However, some inconsistencies remain. This summer will be the first operational year of this warehouse.

Appeals and Consequences to missing data deadlines - Board Rule R277-484. Data Standards, Deadlines and Procedures gives clear and specific detail regarding data deadlines. Districts must meet data deadlines or funds will be withheld. This rule also specifies procedures to get an extension for a deadline.

Supporting evidence and background:

- Utah State Board Rule R277-484
<http://www.usoe.k12.ut.us/data/R277-484.pdf>
- U-PASS/NCLB Data Memo – Appendix H
- External Audit Report 2002
<http://www.usoe.k12.ut.us/admin/projects/mgt/prelim%20report.pdf>
- Testing & Scoring Procedures – Appendix C

- Legislation for Data Warehouse – Appendix D

1.5 Accountability system includes report cards for public schools and LEAs.

The state has required accountability reports from schools and LEAs for several years. These reports are issued annually in January. The USOE, by legislation, was slated to take over school level reporting in Fall 2004. With passage of NCLB, however, this timeline has been moved up to Fall 2003. The Data Warehouse on the same timeline will generate district performance reports. The Data Warehouse is the collection database for all student information submitted by schools and LEAs (see explanation of data in section 1.4).

Reports include aggregated and disaggregated academic achievement data by race/ethnicity, poverty, and students with limited English proficiency, students receiving special education services, gender, and migrant status.

Districts are required by law to make these reports available to the public either in print or electronic copy. In addition to the district level distribution, reports will be available through USOE. The reports will be available in English and Spanish, translated following standard procedure for document preparation. The USOE maintains a contract for Spanish translation with a certified translator and will continue to provide documents to the public in Spanish.

Supporting evidence and background:

- U-PASS Legislation & State code regarding testing – Appendix A.
- Future School Report – Appendix E

1.6 Accountability system includes rewards and sanctions for public schools and LEAs.

Utah will comply with NCLB requirements to identify for improvement, take corrective action, and restructure schools based on AYP for schools receiving Title I funds. In addition, LEAs and schools will be identified for exemplary performance. All schools' status with regard to AYP will be made available to the public through performance reports and media sources.

Utah LEA and State Sanctions	
For Title I schools failing to make AYP after each year, the LEA must do the following:	
Year 1	Warning issued. Superintendents are encouraged to take immediate action to assist toward improvement.
Year 2	<ul style="list-style-type: none">• LEA designates school as needing improvement before the beginning of the school year following failure to make AYP.• LEA must notify all parents of school's designation.• School develops or revises a two-year achievement plan to be approved by LEA within three months of improvement designation. Plan must include required elements: scientifically-based research, successful actions, professional development including 10% of its Title I Part A funds, specific annual, measurable goals and targets, fundamental teaching and learning needs, parental involvement, additional time for learning, and shared responsibility for improvement.• LEA and/or qualified others provide technical assistance* with scientifically based quality support.• LEA convenes peer review process within 45 days of receiving the plan or sooner, as possible.• LEA grants full or conditional approval.• School implements plan expeditiously but not later than next full school year.• State ensures that LEA has assisted well.• State provides assessment data.• LEA provides transfer option and transportation to all students to another public/charter school not under improvement, as desired by parent/student.
*Technical assistance must include at least six elements: Scientifically based research; analysis of data; parental involvement; sustained, aligned, and focused professional development; instructional strategies; and focused budget and resources.	

Year 3	<ul style="list-style-type: none"> • Designation • Notification • Technical assistance • Transfers • LEA arranges provision for supplemental service to all eligible students. LEA provides annual notice of eligibility for supplemental services. • State assigns monitor
Year 4	<ul style="list-style-type: none"> • Designation. • Notification • Technical assistance • Transfers • Supplemental services • Required corrective action and notice of corrective action. • State approves or revises corrective action and advises Utah State Board of Education of designation. • State continues monitoring.
Year 5	<ul style="list-style-type: none"> • Designation. • Notification • Technical assistance • Transfers • Supplemental services • Corrective action • LEA develops plan for alternative governance provisions • State intervention at LEA level possible
Year 6	<ul style="list-style-type: none"> • Designation • Notification • Technical assistance • Transfers • Supplemental services • Corrective action • LEA must implement plan for alternative governance provisions • State intervention at LEA level possible
NOTE:	<p>Sanctions applied to LEAs include, in the same year as noted above:</p> <ul style="list-style-type: none"> • Designation • Notification • Technical Assistance • Supplemental services • Corrective action • Monitoring • Alternative governance

There will be no sanctions or designations for non-Title I schools beyond those specified in U-PASS for all Utah schools. U-PASS specifies school improvement plans for all Utah schools, regardless of Title I status.

Rewards

Schools making AYP and those making significant improvement will be recognized by the USOE. All schools and LEAs will be acknowledged, regardless of Title I status. Recognition may include: media/press release; visits from dignitaries; certificates, banners, or plaques.

Supporting evidence and background:

- U-PASS Legislation & State code regarding testing – Appendix A.

PRINCIPLE 2. All Students

2.1 Accountability system includes all students.

By law, all Utah students participate in the Core CRT program. Over the past three years, because of state and federal accountability, several steps have been refined to ensure inclusion of all students. Many of these modifications were implemented to meet state accountability and federal special education legislation (i.e., IDEA 1997).

For the last 10 years, the USOE has pre-printed answer sheets for Utah students. This pre-printing has increased the quality and quantity of student test data. Pre-print files are submitted to the USOE by LEAs and are compared with other student level data submitted by LEAs, including the S3 and clearinghouse data (see section 1.4 for details).

Utah has defined appropriate accommodations for students with disabilities. The use of Core CRTs has allowed for a variety of accommodations to be selected by the IEP team and still yield valid results that do not affect the test score interpretation.

For the past three years, Utah has designated two types of alternate assessments for students with the most significant cognitive disabilities. The purpose of these alternate assessments is to measure the achievement of students with disabilities against alternate academic achievement standards as defined by the State. The two assessment approaches provided in Utah are out-of-level testing and Utah's Alternate Assessment (UAA).

Utah's Alternate Assessment (UAA) is designed for assessing students with severe disabilities, especially those with the most significant cognitive disabilities. Objectives for the UAA are based on the student's IEP goals. Although the UAA is operational, it is in the final stages of test refinement. Changes currently underway will ensure accurate measurement of achievement against alternate academic achievement standards. By the 2003-04 school year, alignment of the UAA objectives with the extended core curriculum will be finalized.

Out-of-level tests are allowed in language arts and mathematics, but only for students enrolled in special education. IEP teams may specify the administration of a test that is below the grade of enrollment at a level corresponding with the student's grade level of instruction. Results are reported in relation to the test level rather than the grade of enrollment. Since out-of-level testing does not yield results for the grade in which the student is enrolled, it will be phased out as an assessment option by the 2004-05 school year in coordination with the implementation of changes to the UAA as described above. In determining AYP, out-of-level tests will be counted as "not proficient".

Youth in Custody (YIC) students, as well as students in special purpose schools, also participate in testing and accountability. YIC facilities work with LEAs to obtain testing materials. The LEAs must either declare the YIC program as a school or include them with other alternative schools.

All students with limited English proficiency will participate in accordance with NCLB. Students will participate in testing, with appropriate accommodations, regardless of

language proficiency level or length of enrollment. These accommodations may include, but are not limited to, testing in the student's native language, linguistic accommodations, and small group settings.

Supporting evidence and background:

- Requirements for Testing – Appendix F
- Alternate Assessment Results
<http://www.usoe.k12.ut.us/eval/WhatsNew/UAASummary02.doc>

2.2 Accountability system has a consistent definition of full academic year.

In 2002, as part of Utah's Title I compliance agreement, the USOE defined a full academic year as one in which students are continuously enrolled in the same school from the 26th day of the school year or October 1, which ever comes first, through the end of the spring testing window. The 26th day of school is included here to accommodate year-round school schedules that typically begin in July.

Data regarding our definition of full academic year has been collected for many years; consequently, the quality of the data is high. Utah's October 1 student count provides the most comprehensive record of students enrolled at the beginning of the school year. As part of our spring Core CRT administration, LEAs are required to submit a current and complete list of students by grade. This allows a precise look at which students were enrolled continuously throughout the school year. Exit codes are the primary method to determine if an individual has not attended a school for a complete academic year. Temporary non-attendance due to suspensions will not constitute a break in enrollment, unless the student is transferred to another school or LEA (e.g. to a Youth in Custody center, long term).

A student attending the same school from the 26th day of school or October 1 (which ever comes first) through the end of the spring test administration window will be included in determining if a school makes AYP. Students enrolled in more than one school within a single LEA from October 1 through the end of the spring test administration window will be included in determining the AYP of the LEA. Finally, all Utah students who have remained in a Utah school for a full academic year will be part of the statewide AYP calculation, including students who have not been enrolled in any single LEA for the full academic year.

2.3 Accountability system properly includes mobile students.

The development of the Data Warehouse allows the USOE to include and track students who move frequently. The Warehouse gathers data from a variety of collection sources, including test data, S3 data, and clearinghouse data (see section 1.4 for details). Given the current development schedule, the Data Warehouse will be operational in Fall 2003.

From a testing perspective, all students, regardless of the amount of time they have been at a school, participate in the Core CRTs at the end of the school year. The reporting of school and LEA Core CRT performance results includes all students including mobile students and other special populations, such as students receiving special education services and students with limited English proficiency.

Supporting evidence and background:

- USOE Data Warehouse (information & background)
<http://www.usoe.k12.ut.us/upass/>
- Warehouse Data Dictionary
<http://www.usoe.k12.ut.us/upass/oct29meeting/Visio-warehouse%20load.pdf>
- U-PASS Legislation & State code regarding testing – Appendix A.
- Future School Report – Appendix E

PRINCIPLE 3: Method of AYP Determinations

3.1 Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-14.

Utah's accountability system uses three criteria for AYP determination: academic achievement, participation rate, and an additional indicator. These three criteria will be applied to both mathematics and reading/language arts separately.

Utah has incorporated the NCLB expectation that by 2013-14 all student subgroups, schools, and LEAs will demonstrate proficiency in the areas of reading/language arts and mathematics. Utah's plan includes all public, charter, and special population schools.

To determine if yearly progress is made, starting points will be set for mathematics and reading/language arts at each of two levels: elementary/middle school and high school. The starting point will be set according to federal guidelines (see section 3.2a for details). Based on the starting point in 2001-2002 school year and the ultimate goal of 100% of students proficient by 2013-2014 school year, intermediate goals will be set based on the statewide annual measurable objectives (see sections 3.2b and 3.2c for details). Schools must meet the annual measurable objectives or make acceptable improvement (*safe harbor* provision) for academic achievement as part of the requirements for making AYP.

The other two criteria – participation rate and additional indicators will also be used to make AYP determinations for student subgroups, schools, and LEAs. Details of these two criteria are in sections 7 and 10 respectively.

3.2 Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.

Utah's accountability plan will use three criteria – academic achievement, participation rate, and additional indicator – for determining in student subgroups, schools, and LEAs have made adequate yearly progress. The Data Warehouse will serve as the data source for making the determination of AYP for student subgroups, schools, and LEAs. As described in section 1.4, the Data Warehouse stores data from test files, clearinghouse data (including student demographic information), and S3 year-end data containing additional student information for determining membership in relevant subgroups.

Academic Achievement

In determining AYP for student subgroups, schools, LEAs and the state as a whole, Utah will compare the percent of students proficient to the annual measurable objective, examine participation rates, and examine the additional academic indicator. Consecutive years of failing AYP requirements will be based on failing the same subject (reading/language arts or mathematics) for two consecutive years. This approach is consistent with NCLB's goal of successfully remediating subject performance deficiencies and will reduce the potential for falsely concluding that a school building or LEA is not meeting AYP requirements.

A student subgroup, school, or LEA of 10 or more students must meet or exceed the annual measurable objective for reading/language arts and mathematics, must have at least a 95 percent participation rate for subgroups of 40 students or more, and meet the state's requirement for another academic indicator (attendance for elementary and middle schools and graduation for high schools). If a student subgroup, school, or LEA fails to meet or exceed the annual measurable objective, it must have reduced the percent of students not proficient by the appropriate percentage (*safe harbor*). If the *safe harbor* provision is employed, the additional indicator must be disaggregated and used for determining AYP.

Table 3 displays the impact data for various N sizes on student subgroups. These data indicate that the minimum N selected by Utah, N=10, will allow the maximum number of schools to be held accountable for student subgroup performance.

Table 3: Impact Data for Various Minimum N Sizes – Grades 3-8

Number of Schools with Subgroups Included in AYP Analysis for Various Minimum N Sizes (School with >10 students = 522)					
	Minimum N				
	10	25	30	50	75
School	522				
White	511	486	483	471	440
Low Income	491	444	427	355	265
Students with Disabilities	450	280	227	63	11
Limited English Proficient	308	173	149	81	41
Hispanic	294	161	144	87	48
Black	29	2	1	0	0

In calculating AYP for LEAs, schools, and subgroups, Utah will employ a test of statistical significance with a one-tailed *alpha* of 0.01. This will allow schools with small subgroup populations to be held accountable without falsely identifying a school. This creates a balance between validity (holding schools accountable for all students) and reliability (assuring that those subgroups identified have not been so identified simply on the basis of random fluctuation of scores). For AYP determination based on the annual measurable objective, a test of statistical significance will be applied for subgroups ≥ 10 . The null hypothesis is that the observed percent of students proficient in any subgroup is equal to the required percent proficient defined by the annual measurable objective. The test of statistical significance is a z-score with the distribution of school mean scores (in terms of percent correct) around the null hypothesis. A school or LEA makes AYP if the null hypothesis is *not rejected*.

In calculating AYP, any LEA, school, or student subgroup that did not meet the annual measurable AYP goal, must decrease the percentage of students not proficient by at least 10 percent in accordance with the *safe harbor* provision. Through U.S. Department of Education directive, Utah, for the 2003 data year only, will employ a test of statistical significance using a one-tailed *alpha* of 0.25 for determining schoolwide *safe harbor* (improvement). Data and results from this method will be submitted to the U.S. Department of Education for further review and discussion. Based on that discussion and Department approval, it is Utah's intention to implement the following multi-year plan in 2004-2014 of implementing NCLB. Utah will apply a test of statistical significance with a one-tailed *alpha* of 0.01 for groups with $N \geq 10$ for two consecutive years (Year Two $N \geq 20$, with no less than 10 in a single year). The null hypothesis used will be that any subgroup or school not meeting the annual measurable goal has reduced the number of students not proficient by 10 percent. In other words, that the observed percent reduction is equal to the required reduction. Because measuring improvement reliably requires a multi-year approach, Utah will use the following to determine if student subgroups have made AYP based on *safe harbor* provisions:

- In the first year of NCLB implementation, reduction in percent not proficient (improvement) will be compared to the baseline year. The LEA, school, or student subgroup will make AYP if the null hypothesis is *not rejected*.
- For the second year of NCLB implementation, improvement will be measured from the previous year and from two years previous. Any school or subgroup will make AYP if (a) the null hypothesis is *not rejected* at the 0.01 level that the portion of students not proficient has been reduced by 19 percent over two years OR (b) the observed portion of students not proficient over the past year has been reduced by 10 percent. The test of statistical significance will be calculated on the two-year data only.
- For the third and *all subsequent* years of NCLB implementation, improvement will be measured from the previous year, from two years previous and previous three years. The LEA, school, or student subgroup will make AYP if (a) one *does not reject* the null hypothesis at the 0.01 level that the portion of students not proficient has been reduced by 27.1 percent over three years, OR (b) the observed

portion of students not proficient over the past two years has been reduced by 19 percent, OR (c) the observed portion of students not proficient over the past year has been reduced by 10 percent. Note that the test of statistical significance will be calculated on the three-year data only.

This system acknowledges that while the reliability of measuring improvement over one year is low except for large subgroups, it becomes substantially higher if improvement is examined over two years and even higher over three years. At the same time, the system recognizes that an LEA, school, or student subgroup will make AYP if it can show that performance has substantially improved in the most current year(s). Therefore, the first test in each case is one of statistical significance for improvement over the longest period of time. If the LEA, school, or subgroup fails that test, it still can make AYP by showing substantial growth, but it no longer has the advantage of statistical uncertainty – the observed results must have increased by the required amount or it fails to make AYP.

Participation Rate

Participation in Core CRTs will be determined for each student subgroup, school, and LEA by comparing the testing pre-print file, test answer documents, clearinghouse data, and S3 data using the Data Warehouse. All students enrolled during the test window will be used as the denominator when calculating participation. Students with a valid test score on Core CRTs or the UAA will be used in the numerator. This process will be used for all student subgroups, schools, and LEAs.

For 2003 only, high school participation rate in mathematics will be based on enrollment in geometry and algebra courses at all grades in the high school. Beginning in 2004, participation will be based on total school membership as described above. For details about participation rate, see section 10.

Additional Indicators

The additional indicators for Utah's accountability plan are attendance (elementary/middle schools) and graduation (high schools). These indicators can be calculated using data in the Data Warehouse. Schools and LEAs must meet the state goals for each indicator to make AYP. In addition, each student subgroup must meet the additional indicator goals if the *safe harbor* provision is employed for any student subgroup in a school. The state goals for the additional indicators are 93% attendance and 85.7% graduation rate. For details about these indicators, see section 7.

Because Utah cannot currently determine graduation rate for all subgroups, a proxy additional indicator will be used to determine AYP for 2003-2006. This proxy will be attendance. The attendance rate will be obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the school and LEA. The goal for attendance will be set at 93%, consistent with the additional indicator goal for elementary and middle schools (see section 7.2). Schools must meet this goal or improve from the previous year.

For a school that meets the annual measurable objective for all subgroups and thus uses only school level data for the additional indicator, graduation will be used. However, if a school employs safe harbor for any subgroup, AYP will be determined using graduation for the total school and attendance for all student subgroups. This temporary situation

will apply equal criteria to all student subgroups while still holding the school accountable for graduation. Beginning in 2007, graduation will be the only additional indicator used at the high school level.

3.2a Accountability system establishes a starting point.

A baseline will be separately established for reading/language arts and mathematics based on NCLB requirements using the 20th percentile school by enrollment ordered by percent proficient for each subject. A separate starting point will be established for grade spans 3-8 and grade 10. The same starting point and the same annual measurable objectives apply to all student subgroups within the grade spans, culminating in 100 percent proficiency of all students by 2013-2014.

Table 4 displays student performance by proficiency. Table 5 displays performance based on grade level for the Grade 3-8 grade span. Finally, Table 6 displays the 20th percentile score for Utah schools by enrollment, when ranked by performance.

Table 4: Number and Percent of Students by Proficiency – Grades 3-8

Overall	Proficient (Level 3 and 4)	Not Proficient (Levels 1 and 2)	Mastery Missing	Total Included
Language Arts	153,335 (73.74%)	54,599 (26.26%)	7,888	207,934
Mathematics	140,303 (67.29%)	68,202 (32.71%)	7,317	208,505

Table 5: Performance by Grade – Grades 3-8

Grade	Mathematics			Language Arts		
	% Proficient	% Not Proficient	Total Included	% Proficient	% Not Proficient	Total Included
3	71	29	35,498	76	24	35,544
4	71	29	36,292	77	23	36,169
5	71	29	35,319	77	23	35,211
6	61	39	34,967	71	29	35,396
7	65	35	33,249	79	21	32,941
8	65	35	33,180	62	38	32,673

Table 6: Starting Point – Grades 3-8 and High School

Content Area	Percent Proficient
Language Arts 3-8	65%
Mathematics 3-8	57%
Language Arts HS	64%
Mathematics HS	35%

To verify that the 20th percentile score by enrollment, once ranked by performance, was higher than the lowest student subgroup performance, the student subgroup data were analyzed. Table 7 displays student subgroup performance results for the 3-8 grade span. These results verify the use of the 20th percentile scores for Utah's baseline value.

Table 7: Student Subgroup Performance – Grades 3-8

Subgroup (Ordered by number of students)	Language Arts		Mathematics	
	% Proficient	Total Included	Percent Proficient	Total Included
Caucasian	78%	176,164	71%	175,985
Low Income	59%	66,081	53%	66,707
Students with Disabilities	31%	23,029	28%	23,770
Limited English Proficient	48%	19,148	43%	19,754
Hispanic	46%	18,881	40%	19,467
American Indian	42%	3,481	37%	3,529
Asian/Pacific Islander	75%	3,342	74%	3,392
Black	53%	2,175	42%	2,189

Table 8 displays the student subgroup performance on Language Arts for 10th grade in Utah. These data are included to verify the 20th percentile starting point, which is 64 percent proficient.

Table 8: 10th Grade Language Arts

Student Subgroup (Ordered by number of students)	% Proficient	Total Included
Caucasian	76.6%	25,868
Low Income	58.3%	5,449
Hispanic	47.0%	1,617
Limited English	46.0%	1601
Special Education	22.4%	1,573
Asian	68.9%	437
American Indian	33.2%	335
Pacific Islander	53.9%	325
Black	51.9%	212
Total	73.9%	37,417

Starting point data is not yet available for high school in mathematics. Once these data are available they will be sent. See section 6.1 for details.

3.2b Accountability system establishes statewide annual measurable objectives.

Utah will establish separate annual measurable objectives for reading/language arts and mathematics. Annual measurable objectives will use the same percent proficient as the most recent intermediate goal. The reading and mathematics annual measurable objectives will be applied to all student subgroups, schools, LEAs, and the state as a whole. A separate starting point will be established for grades spans 3-8 and grade 10. When calculating the percent proficient for a school with multiple grade levels, as well as the subgroups within them, the annual measurable objective will be an aggregate of the percent of proficient students at all grade levels in the school (a weighted average).

3.2c Accountability system establishes intermediate goals.

Utah will incorporate intermediate goals for the minimum percentage of students achieving proficiency.

The intermediate goals will assume equal increases expected each year based on the proficiency gap between the baseline percent proficient and 100 percent proficient divided by the 12 intervening years (annual increase). However, the required percent proficient will not be increased each year, rather it will be increased every other year and in the final year of the program. Table 9 displays these values for Reading/Language Arts and Mathematics, based on the results of the 2002 administration of the Core CRTs.

Spring 2002	Starting Point
Spring 2005	Goal 1: Starting Point + (Annual increase * 2)
Spring 2007	Goal 2: Spring 2004 Goal + (Annual increase * 2)
Spring 2009	Goal 3: Spring 2006 Goal + (Annual increase * 2)
Spring 2011	Goal 4: Spring 2008 Goal + (Annual increase * 2)
Spring 2013	Goal 5: Spring 2010 Goal + (Annual increase * 2)
Spring 2014	Final Goal: 100 % proficient

Table 9: Starting Point and Intermediate Goals – Grades 3-8 and HS

	Starting Point	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5	Final
Language Arts Grades 3-8	65 %	71 %	77 %	83 %	89 %	95 %	100 %
Mathematics Grades 3-8	57 %	64 %	71 %	78 %	85 %	92 %	100 %
Language HS Grade 10	64 %	70 %	76 %	82 %	88 %	94 %	100 %
Mathematics Grade 11	NA*						

*Not Available, see section 6.1 for explanation

PRINCIPLE 4: Annual Decisions

4.1 Accountability system determines annually the progress of schools and LEAs.

AYP decisions will be made annually for each LEA and school. AYP determination will be based on percent of students proficient or the reduction of students not proficient, participation rate, and achievement of the additional academic indicator. Reading/language arts and mathematics will be examined separately for each of the aforementioned criteria for AYP. Annual measurable objectives for academic achievement will be based on the most recent intermediate goal. Failing to make AYP will be based on failing the same subject (reading/language arts or mathematics) for two consecutive years. This approach is consistent with the NCLB goal of successfully remediating subject performance deficiencies and will reduce the potential for falsely concluding that a school or LEA is not meeting AYP requirements.

PRINCIPLE 5: Subgroup Accountability

5.1 The accountability system includes all the required student subgroups.

Both state accountability and NCLB require the disaggregation and reporting of the following student subgroups:

Race/Ethnicity

Economically Disadvantaged

Students with Disabilities

Students with Limited English Proficiency

Data for required subgroups have been collected by USOE for several years and will be generated from the Data Warehouse. Utah school performance and LEA performance results are disaggregated by subgroups.

Supporting evidence and background:

- USOE Data Warehouse (information & background) -
<http://www.usoe.k12.ut.us/upass/>
- Warehouse Data Dictionary -
<http://www.usoe.k12.ut.us/upass/oct29meeting/Visio-warehouse%20load.pdf>
- U-PASS Legislation & State code regarding testing – Appendix A.
- Current School/Performance Reports -
<http://www.usoe.k12.ut.us/eval/WhatsNew/AssessmentResults.htm>
- Future School Report – Appendix E

5.2 Accountability system holds schools and LEAs accountable for the progress of student subgroups.

Utah's accountability plan will use three criteria – academic achievement, participation rate, and additional indicator – for determining in student subgroups, schools, and LEAs have made adequate yearly progress. The Data Warehouse will serve as the data source for making the determination of AYP for student subgroups, schools, and LEAs. As described in section 1.4, the Data Warehouse stores data from test files, clearinghouse data (including student demographic information), and S3 year-end data containing additional student information for determining membership in relevant subgroups.

Academic Achievement

In determining AYP for student subgroups, schools, LEAs and the state as a whole, Utah will compare the percent of students proficient to the annual measurable objective, examine participation rates, and examine the additional academic indicator. Consecutive years of failing AYP requirements will be based on failing the same subject (reading/language arts or mathematics) for two consecutive years. This approach is consistent with NCLB's goal of successfully remediating subject performance deficiencies and will reduce the potential for falsely concluding that a school building or LEA is not meeting AYP requirements.

A student subgroup, school, or LEA of 10 or more students must meet or exceed the annual measurable objective for reading/language arts and mathematics, must have at least a 95 percent participation rate for subgroups of 40 students or more, and meet the state's requirement for another academic indicator (attendance for elementary and middle schools and graduation for high schools). If a student subgroup, school, or LEA fails to meet or exceed the annual measurable objective, it must have reduced the percent of students not proficient by the appropriate percentage (*safe harbor*). If the *safe harbor* provision is employed, the additional indicator must be disaggregated and used for determining AYP.

Table 3 displays the impact data for various N sizes on student subgroups. These data indicate that the minimum N selected by Utah, N=10, will allow the maximum number of schools to be held accountable for student subgroup performance.

Table 3: Impact Data for Various Minimum N Sizes – Grades 3-8

Number of Schools with Subgroups Included in AYP Analysis for Various Minimum N Sizes (School with >10 students = 522)					
	Minimum N				
	10	25	30	50	75
School	522				
White	511	486	483	471	440
Low Income	491	444	427	355	265
Students with Disabilities	450	280	227	63	11
Limited English Proficient	308	173	149	81	41
Hispanic	294	161	144	87	48
Black	29	2	1	0	0

In calculating AYP for LEAs, schools, and subgroups, Utah will employ a test of statistical significance with a one-tailed *alpha* of 0.01. This will allow schools with small subgroup populations to be held accountable without falsely identifying a school. This creates a balance between validity (holding schools accountable for all students) and reliability (assuring that those subgroups identified have not been so identified simply on the basis of random fluctuation of scores). For AYP determination based on the annual measurable objective, a test of statistical significance will be applied for subgroups ≥ 10 . The null hypothesis is that the observed percent of students proficient in any subgroup is equal to the required percent proficient defined by the annual measurable objective. The test of statistical significance is a z-score with the distribution of school mean scores (in terms of percent correct) around the null hypothesis. A school or LEA makes AYP if the null hypothesis is *not rejected*.

In calculating AYP, any LEA, school, or student subgroup that did not meet the annual measurable AYP goal, must decrease the percentage of students not proficient by at least 10 percent in accordance with the *safe harbor* provision. Through U.S. Department of Education directive, Utah, for the 2003 data year only, will employ a test of statistical significance using a one-tailed *alpha* of 0.25 for determining schoolwide *safe harbor* (improvement). Data and results from this method will be submitted to the U.S. Department of Education for further review and discussion. Based on that discussion and Department approval, it is Utah's intention to implement the following multi-year plan in 2004-2014 of implementing NCLB. Utah will apply a test of statistical significance with a one-tailed *alpha* of 0.01 for groups with $N \geq 10$ for two consecutive years (Year Two $N \geq 20$, with no less than 10 in a single year). The null hypothesis used will be that any subgroup or school not meeting the annual measurable goal has reduced the number of students not proficient by 10 percent. In other words, that the observed percent reduction is equal to the required reduction. Because measuring improvement reliably requires a multi-year approach, Utah will use the following to determine if student subgroups have made AYP based on *safe harbor* provisions:

- In the first year of NCLB implementation, reduction in percent not proficient (improvement) will be compared to the baseline year. The LEA, school, or student subgroup will make AYP if the null hypothesis is *not rejected*.
- For the second year of NCLB implementation, improvement will be measured from the previous year and from two years previous. Any school or subgroup will make AYP if (a) the null hypothesis is *not rejected* at the 0.01 level that the portion of students not proficient has been reduced by 19 percent over two years OR (b) the observed portion of students not proficient over the past year has been reduced by 10 percent. The test of statistical significance will be calculated on the two-year data only.
- For the third and *all subsequent* years of NCLB implementation, improvement will be measured from the previous year, from two years previous and previous three years. The LEA, school, or student subgroup will make AYP if (a) one *does not reject* the null hypothesis at the 0.01 level that the portion of students not proficient has been reduced by 27.1 percent over three years, OR (b) the observed

portion of students not proficient over the past two years has been reduced by 19 percent, OR (c) the observed portion of students not proficient over the past year has been reduced by 10 percent. Note that the test of statistical significance will be calculated on the three-year data only.

This system acknowledges that while the reliability of measuring improvement over one year is low except for large subgroups, it becomes substantially higher if improvement is examined over two years and even higher over three years. At the same time, the system recognizes that an LEA, school, or student subgroup will make AYP if it can show that performance has substantially improved in the most current year(s). Therefore, the first test in each case is one of statistical significance for improvement over the longest period of time. If the LEA, school, or subgroup fails that test, it still can make AYP by showing substantial growth, but it no longer has the advantage of statistical uncertainty – the observed results must have increased by the required amount or it fails to make AYP.

Participation Rate

Participation in Core CRTs will be determined for each student subgroup, school, and LEA by comparing the testing pre-print file, test answer documents, clearinghouse data, and S3 data using the Data Warehouse. All students enrolled during the test window will be used as the denominator when calculating participation. Students with a valid test score on Core CRTs or the UAA will be used in the numerator. This process will be used for all student subgroups, schools, and LEAs.

For 2003 only, high school participation rate in mathematics will be based on enrollment in geometry and algebra courses at all grades in the high school. Beginning in 2004, participation will be based on total school membership as described above. For details about participation rate, see section 10.

Additional Indicators

The additional indicators for Utah's accountability plan are attendance (elementary/middle schools) and graduation (high schools). These indicators can be calculated using data in the Data Warehouse. Schools and LEAs must meet the state goals for each indicator to make AYP. In addition, each student subgroup must meet the additional indicator goals if the *safe harbor* provision is employed for any student subgroup in a school. The state goals for the additional indicators are 93% attendance and 85.7% graduation rate. For details about these indicators, see section 7.

Because Utah cannot currently determine graduation rate for all subgroups, a proxy additional indicator will be used to determine AYP for 2003-2006. This proxy will be attendance. The attendance rate will be obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the school and LEA. For a school that meets the annual measurable objective for all subgroups and thus uses only school level data for the additional indicator, graduation will be used. However, if a school employs safe harbor for any subgroup, AYP will be determined using graduation for the total school and attendance for all student subgroups. This temporary situation will apply equal criteria to all student subgroups while still holding the school accountable for graduation. Beginning in 2007, graduation will be the only additional

indicator used at the high school level. The goal for attendance will be set at 93%, consistent with the additional indicator goal for elementary and middle schools (see section 7.2). Schools must meet this goal or improve from the previous year.

5.3 Accountability system includes students with disabilities.

For the past three years, Utah has designated two types of alternate assessments for students with the most significant cognitive disabilities. The purpose of these alternate assessments is to measure the achievement of students with disabilities against alternate academic achievement standards as defined by the State. The two assessment approaches provided in Utah are out-of-level testing and Utah's Alternate Assessment (UAA).

Utah's Alternate Assessment (UAA) is designed for assessing students with severe disabilities, especially those with the most significant cognitive disabilities. Objectives for the UAA are based on the student's IEP goals. Although the UAA is operational, it is in the final stages of test refinement. Changes currently underway will ensure accurate measurement of achievement against alternate academic achievement standards. By the 2003-04 school year, alignment of the UAA objectives with the extended core curriculum will be finalized.

Out-of-level tests are allowed in language arts and mathematics, but only for students enrolled in special education. IEP teams may specify the administration of a test that is below the grade of enrollment at a level corresponding with the student's grade level of instruction. Results are reported in relation to the test level rather than the grade of enrollment. Since out-of-level testing does not yield results for the grade in which the student is enrolled, it will be phased out as an assessment option by the 2004-05 school year in coordination with the implementation of changes to the UAA as described above. In determining AYP, out-of-level tests will be counted as "not proficient". However, out-of-level tests will be counted within the 95% participation.

The state's preprinting of student IDs on answer sheets, the scanning and scoring of Core CRTs within the state, and the USOE Data Warehouse provide a series of checks to verify the inclusion of students with disabilities in testing and in accountability.

Supporting evidence and background:

- Requirements for Testing – Appendix F
- Alternate Assessment Results
- Current School/Performance Reports - Including Students with Disabilities

<http://www.usoe.k12.ut.us/eval/WhatsNew/UAASummary02.doc>
<http://www.usoe.k12.ut.us/eval/WhatsNew/AssessmentResults.htm>

5.4 Accountability system includes limited English proficient students.

Limited English proficient students are currently included in statewide testing and the reporting of results. Both U-PASS and NCLB requires reporting the progress of subgroups including limited English proficient students. Current policy is based on a previous reauthorization of ESEA, but will be revised to comply with NCLB requirements to ensure that not less than 95% of LEP students participate in testing. If students are exempted, under current state policy, they will count against the 95% participation rate for the school and LEA. Students with limited English proficiency will receive accommodations for testing, as outlined in Utah's Requirements for Testing document. These accommodations may include, but are not limited to, testing in the student's native language, linguistic accommodations, and test administration in small group settings.

The state's preprinting of student IDs on answer sheets, the scanning and scoring of Core CRTs within the state, and the USOE Data Warehouse provide a series of checks to verify the inclusion of students with limited English proficiency in testing and in accountability.

Supporting evidence and background:

- Current School/Performance Reports - Including LEP Students - <http://www.usoe.k12.ut.us/eval/WhatsNew/AssessmentResults.htm>
- U-PASS Legislation & State code regarding testing – Appendix A.
- Requirements for Testing – Appendix F

- 5.5 The state has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.

In calculating AYP for subgroups based on the annual measurable objective, and *safe harbor* provision, Utah will employ a test of statistical significance to subgroups ≥ 10 for each year (Year Two $N \geq 20$, with no less than 10 in a single year, etc). This will allow schools with small subgroup populations to be held accountable without falsely identifying a school. This creates a balance between validity (holding schools accountable for all students) and reliability (assuring that those subgroups identified have not been so identified simply on the basis of random fluctuation of scores).

For reporting purposes Utah will apply a minimum size of ten for all subgroups.

For the purpose of determining participation rates, as a component of AYP calculation, Utah will use a minimum size of 40 for all subgroups. The NCLB requirement for participation allows little room for extenuating circumstances when a small group of students are involved. This would allow only two students in a subgroup of 40 to not participate in testing due to circumstances beyond the control of schools.

Table 11 provides impact data for the number of schools that would have sufficient students to include in AYP calculations for various N sizes. This chart clearly indicates that many schools would not be accountable for subgroups if an N size greater than 10 were used.

Table 11: Impact Data for Various Minimum N Sizes – Grades 3-8

Number of Schools with Subgroups Included in AYP Analysis for Various Minimum N Sizes (Schools with >10 students = 522)					
	Minimum N				
	10	25	30	50	75
Schools	522				
White	511	486	483	471	440
Low Income	491	444	427	355	265
Students with Disabilities	450	280	227	63	11
Limited English Proficient	308	173	149	81	41
Hispanic	294	161	144	87	48
Black	29	2	1	0	0

5.6 The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

To assure privacy for students, Utah will not report overall and disaggregated results for groups of less than ten students. Requiring ten or more for reporting is acceptable for the Family Educational Rights and Privacy Act (FERPA) requirements.

Test results for student subgroups and schools with less than ten students will not be displayed either in the hard copy or electronic formats of the school and LEA report card. Instead of values, "<10" will be displayed. If all or none of students in a student subgroup are in the same proficiency level, reports will be masked using "<5%" or ">95%" .

PRINCIPLE 6: Academic Assessments

6.1 Accountability system is based primarily on academic assessments.

Determination of AYP will be based on percent of students proficient on Core CRTs, a required additional academic indicator (attendance in elementary/middle schools, graduation rate in high schools), participation rates, and employment of the *safe harbor* provision. Each of these components will be determined for both reading/language arts and mathematics.

Reading/Language Arts:

Utah will use the Core CRT results from reading/language arts in grades 3-8 and grade 10 to determine percent of students proficient for purposes of AYP.

Proficient is defined as students reaching Level 3 or Level 4. Students in Utah enroll in grade specific language arts courses and therefore participate in the grade specific test. The Utah CRT Language Arts test has several subtests, all of which will be included in determining proficiency. The subtests for Grades 3-6 are oral language, comprehension, vocabulary, writing, phonics and spelling, and viewing. The subtests for Grades 7, 8, and 10 are reading, writing, listening, and viewing.

Mathematics:

Students in Utah enroll in grade specific mathematics courses in grades 3-5 and participate in grade specific tests. However, at grades 6, 7, 8, and 10 Utah does not have a single grade-level assessment for use in determining AYP because students are allowed to select from a variety of mathematics courses at these levels to encourage advanced math achievement. Specifically, students in 6th grade may select to enroll in grade 6 math (grade-level course) or pre-algebra, students in the 7th grade may select to enroll in Math 7 (grade-level course), pre-algebra, or algebra. At the 8th grade, students may advance to the next course in the series, instead of all students being enrolled in pre-algebra (grade-level course). By 10th grade, the courses in which Utah students are enrolled are quite varied; consequently, Utah does not have a single, grade-level test at the high school level.

Utah will use mathematics tests in grades 3-5 that are grade specific. For grades 6-8 the proficiency level for any course in which students are enrolled, at the grade level course or higher, will be used and reported. This will under-represent overall mathematics achievement since more advanced students' scores will not receive "additional" credit. In grades 6, 7, and 8 virtually all students are enrolled in a mathematics course.

Mathematics achievement in 10th grade is not available for Core CRTs since not all students are enrolled in an assessed mathematics course – algebra or geometry. In 2002, 13,983 students in 10th grade were assessed in algebra or geometry, representing about half of 10th grade students, many of whom were repeating the course. This is due to most students being enrolled in mathematics courses beyond geometry or selecting not to take a math course during the sophomore year.

In compliance with Utah's current agreement with the Department of Education, starting points based on 2002 data and AYP determination for 2003 will be based on algebra and geometry scores for students, regardless of grade, enrolled in these courses at the high school. Participation rates will use total students enrolled in algebra and geometry courses as the denominator. Beginning in 2004 and beyond, Utah will use scores from the algebra and geometry items contained on the Stanford-9, administered to all 11th graders in Utah. While this is a norm-referenced test, the mathematics subtest items can be mapped to the algebra and geometry Utah core curriculum, augmented if necessary to fully cover the Utah core curriculum for algebra and geometry, and proficiency levels set based on raw score. Alignment studies will be reviewed externally, then sent to the US Department of Education for approval as Utah's measure of mathematics achievement at the high school. Upon approval, starting point and annual measurable objectives will be determined and forwarded to the Department of Education.

PRINCIPLE 7: ADDITIONAL INDICATORS

7.1 Accountability system includes graduation rate for high schools.

NCLB regulation 200.19(a)(1) requires use of a graduation rate as the "other academic indicator" in determining the AYP of high schools and defines the graduation rate for this purpose as "the percentage of students, measured from the beginning of high school [presumably 9th grade], who graduate from high school with a regular diploma ... in the standard number of years."

This definition implies a cohort rate. We are exercising our option under 200.19(a)(1)(b) to adjust this definition slightly in order to ensure statewide comparability and reduce error in measurement by restricting the cohort to grades ten through twelve, since Utah high schools, which may implement any of three different grade spans, have only these three grades in common; in fact, nearly half have only these three grades -- Grades 7-12 (21% of high schools), Grades 9-12 (33%), and Grades 10-12 (46%).

Specifically, the cohort graduation rate will be operationalized by Utah, following Utha's agreement with NCES (U.S. Dept. of Ed., August 2002, p. 3), in this way:

The number of students who graduated from 12th grade in the current year divided by the sum of: (1) these same graduates, and (2) the number of students who dropped out of 12th grade in the current year, (3) 11th grade in the prior year, and (4) 10th grade in the year before that.

In order to continue applying official NCES definitions in distinguishing "graduates" ("completers" with a "regular diploma") from "other completers" and "dropouts" from "transfers" (U.S. Dept. of Educ., January 2003, pp. 25, 79-81), which have already been incorporated into Utah State Board of Education rule (R277-419), we will also lag the rate by one year; thus, the 2003 report will include the rate for the 2002 cohort.

To illustrate further, we will calculate the graduation rate for a high school in its performance report for the 2002-03 school year by applying the following four step procedure to four files containing school level aggregates on graduates in the school year 2001-02 and dropouts from the years 1999-2000 through 2001-02:

1. From the graduates file, extract the number of "regular diploma" graduates in Spring 2002. This is the numerator.
2. From the dropout files, extract the number of 12th grade dropouts in 2001-2002, 11th grade dropouts in 2000-2001, and 10th grade dropouts in 1999-2000. Drop outs in this case will include students who completed GED or other alternative programs not resulting in a "regular diploma". Those completing a "regular diploma" through early graduation will be considered completers. Note that this simulates the movement of the Class of 2002 cohort through high school.
3. Add the numerator in (1) to the three figures in (2) to obtain the denominator.
4. Divide the numerator by the denominator. This is the cohort graduation rate that will be used for AYP.

Regular diploma graduates may include students with disabilities who can be retained as "seniors" until the age of 22. As long as such students are retained, their cohort status will be adjusted, so that their completion status will be included in the calculation of the graduation rate for the graduating class of the year in which it is finally determined.

Since graduation counts are derived from student level detail, they can be disaggregated by all of the programmatic and demographic categories identified in NCLB legislation. Dropout counts, however, are only available in disaggregated form by gender and ethnicity, as required by the NCES in its Common Core of Data (CCD) surveys.

We can and will repeat the procedure outlined above for each of the six recognized ethnic groups, and store the entire summary results in the Data Warehouse.

To address the discrepancy between CCD and NCLB in disaggregated dropout data requirements, we will modify our dropout reporting form to include breakdowns by "economically disadvantaged" status (whether the student is eligible for free or reduced price school lunch), LEP status, and students with disabilities (whether the student has an IEP) and collect these counts for the first time during the 2004-05 school year, when the Class of 2007 is in 10th grade. This will give LEAs adequate time to make whatever changes they must in local information systems to comply.

Because Utah cannot currently determine graduation rate for all subgroups, a proxy additional indicator will be used to determine AYP for 2003-2006. This proxy will be attendance. The attendance rate will be obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the school and LEA. The goal for attendance will be set at 93%, consistent with the additional indicator goal for elementary and middle schools (see section 7.2). Schools must meet this goal or improve from the previous year.

For a school that meets the annual measurable objective for all subgroups and thus uses only school level data for the additional indicator, graduation will be used. However, if a school employs safe harbor for any subgroup, AYP will be determined using graduation for the total school and attendance for all student subgroups. This temporary situation will apply equal criteria to all student subgroups while still holding the school accountable for graduation. Beginning in 2007, graduation will be the only additional indicator used at the high school level.

NCLB regulation 200.16(a) specifies the 2001-02 school year as the base year for establishing the "starting point" for measuring AYP. We interpret this to mean that we should derive a "cut score" from the graduation rate of the Class of 2002. Using available data and method outlined above, we estimated the graduation rate for this cohort from the beginning of their 10th grade year through the end of their 12th grade year by ethnicity (with the count of regular diploma graduates in parentheses):

Asian	= 84% (502)
Black	= 65% (172)
Hispanic	= 65% (1,574)
Indian	= 67% (313)
Pacific Islander	= 76% (315)
White	= 88% (27,306)
Total	= 86% (30,182)

Schools and LEAs that achieve or exceed a cohort graduation rate of 85.7 percent -- a cut score just below the rate for the entire cohort (see the Total row) -- as well as those that are below that standard but have improved their graduation rate when compared with the prior year, will be considered as having met the additional indicator requirement of AYP. As the table shows, this will be an ambitious goal for several of the ethnic groups and presumably for the students with disabilities and limited English proficiency populations.

The figure of 85.7 has a meaningful interpretation in terms of the event dropout rate. It is obtained by accepting a maximum event dropout rate of 5 percent per year over the life of the cohort. Thus, 95 percent of the cohort remains at the end of 10th grade, 90.025 percent (95% of 95%) remains at the end of 11th grade, and 85.738 percent or (rounded) 85.7 percent (95% of 95% of 95%) remains at the end of 12th grade, the normative time of graduation.

Table12: Dropout Event Rate by Grade

Grade	2001 Fall Enrollment	2001-2002 Dropout Event Count	Dropout Event Rate
7	35,538	367	1.03%
8	35,786	396	1.11%
9	35,029	519	1.48%
10	36,118	843	2.33%
11	35,923	1,387	3.86%
12	34,951	2,430	6.95%

Finally, we note that this figure will not be a starting point as such, but a constant applied every year, since under NCLB regulation 200.19(d)(1), "states are not required to increase the goals of its others academic indicators over the course of the timeline."

7.2 Accountability system includes an additional academic indicator for elementary and middle schools.

NCLB regulation 200.19(a)(2) requires "at least one academic indicator" for elementary and middle schools but does not identify a specific indicator. In subsection (b)(3) "attendance rates" are mentioned as a possibility, and we will use the attendance rate for this purpose.

Unfortunately, we cannot empirically derive a cut score from the 2001-02 school year for the attendance rate as we did with the graduation rate, because we did not collect attendance data at the state level in that year nor have we for several years -- we allocate funds to districts on the basis of membership rather than attendance, and the NCES/CCD has not required us to report attendance data since 1992. We will therefore rely on a recommendation from the Center for Assessment (NCIEA, 2003), which has considerable experience in consulting on the construction of educational accountability systems in several states, as to what constitutes a reasonable value for this purpose.

Accordingly, schools and LEAs that achieve or exceed an attendance rate of 93 percent, as well as those that are below that standard but have improved their attendance rate when compared with the prior year will be considered as having met the additional indicator requirement of AYP.

The attendance rate will be obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the school and LEA. Attendance data can be disaggregated by all student subgroups if a school employees the safe harbor provision.

7.3 Additional indicators are valid and reliable.

Regarding the graduation rate, the definitions of "graduate" and "dropout" used by each district and the formula used by the USOE to calculate the rate complies with NCES standards. In addition, an independent accounting firm formally audits the dropout count in each LEA annually. The basic approach to auditing dropouts is to take a sample of students whom the district has identified as "transfers" and follow the paper trail to see if in fact the district has an appropriate student accounting process and documentation to justify the claim.

Regarding the attendance rate, each district uses the following definition: "Attendance" is the total number of days a student attended a specific school. A student is counted as "in attendance" on a school day if the student was counted on the class role by a teacher as being "present" -- in Grade 1-6, at any time during the day; and in Grades 7-12, in at least one period of the day. The formula used for calculating the attendance rate reflects actual student behavior in the aggregate, on the one hand, and the school's differential responsibility for each student, on the other: a student enrolled for a shorter period with perfect attendance appropriately enhances the school's performance, but a student enrolled for a longer period with poor attendance is appropriately given more weight by virtue of having more days in membership, so the school has an incentive to improve that student's attendance.

REFERENCES:

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PRINCIPLE 8: SEPARATE DECISIONS FOR READING/LANGUAGE ARTS AND MATHEMATICS

8.1 Accountability system holds schools and districts separately accountable for reading/language arts and mathematics.

The AYP calculation will examine separately the percent of students proficient in reading/language arts and mathematics. In addition, participation rates will be examined for each subject separately. Baseline values and annual measurable objectives will be defined for each subject as well. AYP will be determined for each student subgroup, school, LEA and the state as a whole for reading/language arts and mathematics. Consecutive years of failing AYP requirements will be based on failing the same subject (reading/language arts or mathematics) for multiple years.

PRINCIPLE 9: SYSTEM VALIDITY AND RELIABILITY

9.1 Accountability system produces reliable decisions.

Utah has incorporated several features into the accountability program to ensure reliable decisions.

- Core CRTs used as academic measures have been developed using industry standards to produce valid and reliable scores. Use of these tests to make AYP decisions sets a foundation for making reliable decisions.
- Use of statistical significance tests instead of an absolute minimum N for annual measurable objectives will reduce the probability of a Type 1 error (falsely identifying a school for program improvement).
- Base consecutive years of failing AYP on failing the same subject area (reading/language arts or mathematics) for consecutive years.
- Use of statistical significance tests and multiple years of data for making *safe harbor* decisions will reduce the probability of Type 1 errors.

9.2 Accountability system produces valid decisions.

Utah will incorporate several key processes to ensure valid decisions about AYP.

- Tests of statistical significance allow all schools to be accountable for all student subgroups regardless of group size.
- All students are included in Utah's accountability plan, and monitoring processes are in place to verify inclusion.
- Appeals will be allowed at the school and LEA level. A school may have 30 days to appeal an AYP decision to the LEA. An LEA may have 30 days to appeal an AYP decision to USOE.
- USOE has a validation of data processing procedure in place consistent with the established timeline for data submission, processing, and return of results.

Schools may appeal the proposed identification of not making AYP for statistical or other substantive reasons, such as catastrophic events that may have caused errors in test results. The process for technical appeals is detailed here.

Quality control and a chance to correct any errors are critical to the process of creating a valid and reliable system. Student data (background & behavior) and student performance in the academic areas of math and language arts serve as foundations for determining AYP for student subgroups, schools, and LEAs. These student level data are submitted at certain intervals during the school year via the USOE clearinghouse (<http://dcsnt1.usoe.k12.ut.us/Clearinghouse/Clearinghouse.htm>). These data are validated through quality assurance procedures, summarized and forwarded to the USOE data warehouse (<http://www.usoe.k12.ut.us/upass/>). AYP analysis will be performed on the needed USOE warehouse data elements.

Formal and informal appeals processes occur at numerous steps along the way. The following are key data submissions, their timeline and how each element and the overall school status may be appealed.

Student Pre-Print Data (March/April) - Preprint student data is submitted to USOE. This data includes student demographic data. At the district and school level, this data is summarized and sent to districts to approve or make corrections in their operational student data and then resubmitted. The individual information is used to pre-print Core CRT answer sheets. The process has both reduced student burden and improved student data. Districts provide written approval of their pre-print data before answer sheets are printed.

Validation and Appeals: Districts can make corrections and resubmit data up to testing window.

Core CRT Scanning & Scoring (May/June) - Math and Language Arts Core CRTs are submitted and scored by USOE. We are one of only a few states that do in-house scanning and scoring. This approach leads to faster scoring turnaround, stronger quality assurance procedures and more accurate test data transfer to our USOE Data Warehouse. Throughout the scanning process, inconsistencies and problems with student answer sheets are identified and corrected. Depending on the issue, either the district or school is

directly involved. USOE scoring staff is assigned certain districts, which has fostered good relationships with the districts and increases the cooperation as scanning or scoring issues arise. Scoring turnaround and testing procedures are well documented in Utah Board rule, R277-473-3. Time Periods for Administering and Returning Test Materials.

Validation and Appeals: Districts and schools work directly with USOE scoring staff to resolve any inconsistencies or possible errors. These issues and their resolution are documented and dated by USOE staff. Basic score distributions are also examined to assure students are being scored against the correct answer key. Districts must signoff on preliminary raw score results in July. In addition, USOE Scoring staff compare raw score results at the school and grade level with previous years' results to check for testing irregularities and assure quality data.

Clearinghouse “End of Year” data submission (July) - From an accountability perspective, this student level data submission provides background characteristics, grade level data, enrollment date, exit date, graduation status, and attendance records. This serves as the foundation of student level identification to which test data is matched. These data are passed on to the USOE Data Warehouse for integration with the other data systems.

Validation and Appeals: Districts are encouraged to submit this large data file at the start of June. Once data are submitted, USOE analysts verify the structure and format of the data. An edit check program is run against the data to verify its quality and completeness. Written reports and diagnostics are sent to districts regarding this data. Districts are to make necessary corrections and modifications. Final clearinghouse data are due July 15. By that point, districts must provide written verification that data are accurate and complete.

Teacher and Course Data (i.e., CACTUS) submission (July) - Teacher and course level data is maintained in the CACTUS database. This database is centralized by USOE. CACTUS serves as the operational teacher system and is updated throughout the school year. Districts are required to have all changes finalized into the system by July 1st.

Validation and Appeals: USOE staff work a case-by-case basis with districts. Regular training on CACTUS and updates to the data system are conducted during the year. Districts receive written notification reminding them of the CACTUS data submission deadline. The role of schools and districts is to assure the data is accurate and up to date by the end of the school year.

Behavior and Assessment Data Merge (July/August) - USOE data warehouse will begin merging various data systems needed for AYP calculations. We have a common naming and id system that districts should have employed. However, some inconsistencies remain. This summer will be the first operational year of this warehouse.

Validation and Appeals: USOE data warehouse staff will provide districts and their schools data on the success rate and issues regarding matching and merging of student data. Depending on the nature and extent of the problem and overall timelines, districts may resubmit a data element. The State Associate Superintendent in charge of data will ultimately make this decision.

Appeals and Consequences of missing data deadlines - Board Rule R277-484. *Data Standards, Deadlines and Procedures* gives clear and specific detail regarding data deadlines. Districts must meet data deadlines or funds will be withheld. This rule also specifies procedures to get an extension for a deadline.

District and School review of AYP status – Utah schools and districts will have 30 days to appeal the AYP decision as long as they meet all of their data submission requirements. All data elements (outlined above), statistical procedures, merging of student data (outline above) and AYP status will be reviewed. Appeals must be submitted in writing between schools and the LEA and between the LEAs and the SEA. The SEA and the LEA will follow all necessary procedures detailed above. The State Superintendent and the Utah State Board of Education will make final decisions regarding appeals and missing data deadlines.

9.3 State has a plan for addressing changes in assessment and student population.

Core CRTs are pre-equated and post-equated using established psychometric methods and procedures. As new or revised assessments are administered, they will be included in the AYP determination.

The baseline for newly opened schools and school experiencing significant changes in student population due to boundary changes will be based upon the LEAs most recent data. Charter school baseline data will be based on the district in which it is located. These data will be compared to the school's actual data generated during its first year of operation for AYP calculations. In subsequent years, data generated by the school will be used for making AYP determinations. The goal of 100 percent proficiency by 2013-2014 will be established for new schools.

PRINCIPLE 10: PARTICIPATION RATE

10.1 Accountability system has the means for calculating the rate of participation in the statewide assessment.

Utah has several processes in place to account for all students and make a determination of participation rate.

- Answer documents are generated by the pre-print file and submitted to the USOE by each LEA. Each Core CRT answer sheet includes a special codes box that is completed for each student. Participation and non-participation are indicated in the special codes box. All answer documents are returned regardless of student participation.
- The all-students files submitted by LEAs are used as part of the scoring system. Student records are matched with test results.
- The final participation rate will be based on the number of students tested compared with the number of students enrolled at the end of the test administration window.

The 95 percent participation rate will apply to student subgroups and schools with a minimum size of 40. It will apply to all LEAs.

The 95 % participation rate will be based on membership at the school or LEA, not on continuous enrollment. Therefore, all students enrolled at a school must participate in testing whether or not the student's score will be part of the academic achievement determination as part of AYP. Students not included in the school academic achievement determination may, in fact, be counted at the LEA level, necessitating a test score.

For 2003 only, high school participation rate in mathematics will be based on enrollment in geometry and algebra courses at all grades in the high school. Beginning in 2004, participation will be based on total school membership as described above.

10.2 Accountability system has a means of applying the 95 percent assessment criteria to student subgroups and small schools.

Schools buildings and LEAs will be required to administer Core CRTs to all students enrolled at the time of test administration. Schools and LEAs that include 95 percent of the enrolled students will meet this requirement for AYP. Participation will be calculated for reading/language arts and mathematics separately. Those schools and LEAs in which less than 95 percent of any student subgroup participates in testing will not meet the AYP standard, provided that the subgroup size is at least 40.